

The Commonwealth of Massachusetts
Executive Office of Health and Human Services
Department of Public Health
William A. Hinton State Laboratory Institute
305 South Street, Jamaica Plain, MA 02130

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COMMISSIONER

Joseph Roseme, ADA

Suffolk County District Attorney's Office
By e-mail

February 16, 2012

Re: Comm. v. [REDACTED]

ADA Roseme,

Please find below the discovery package for the case noted above. The material is collated in the following manner:

- 1) the c.v.'s of the chemists
- 2) the Evidence Office receipt to the Boston Police
- 3) the inventory control card
- 4) the pharmaceutical analysis Sheet
- 5) the pharmacopeia reference, *Micromedex*
- 6) the gas chromatography/mass spectrometry (gc/ms) data

I was the custodial chemist responsible for the chain of custody, weights and the preliminary analysis of the exhibit. Kate Corbett operated the gc/ms for the confirmatory analysis.

If you need further clarification of this material, call me directly at (617) 983-6627.

Sincerely,

A handwritten signature in black ink, appearing to read "Michael Lawler".

Michael Lawler
Senior Chemist

Cc: Kate Corbett

Curriculum Vitae

Michael Lawler

Education:

University of Virginia, Charlottesville, Va. Bachelor of Arts in English, 1975

Harvard University, Cambridge, Ma. Master of Arts in biology, 1995

Experience:

1990-present currently Chemist III, Mass. Dept. of Public Health, Drug Lab analyst determining the identity of unknown substances and providing expert testimony in the Courts. Conduct special testing for poisons within drug exhibits (e.g. strychnine in MDMA)

2005-2008 lecturer in chemistry, Curry College, Milton, Ma.

1988-1990 New England Newborn Screening (NENS) Biochemist conducting pilot studies and validation trials of new newborn screening tests. Investigator and co-author of papers noted below. Introduced screening test for Biotinidase Deficiency. Liaison with interstate collaborators in national studies.

1983-1988 Supervised NENS urine screening lab for metabolic disorders. Conducted research in collaboration with Children's Hospital (Boston) detecting neuroblastoma, a cancer of early childhood. Conducted reference testing for rare metabolic disorders for an international audience.

1982-1983 NENS hypothyroid assay technologist with Tuft's University

1979-1981 Mass. Bay Community College, staff technologist preparing materials for the laboratory technician program, which included reagents, apparatus and maintaining stock cultures of human pathogens.

Additional education and special training

Drug Analysis, completed six week training course by senior staff within the Department of Public Health Drug Analysis Laboratory

National Laboratory Network Training Program course as Expert Witness

Qualified as an expert witness in the Massachusetts Courts and the U.S. District Court

Current Drug Trends – Multijurisdictional Drug Task Force Academy August 2009

CDC course in public health response to bioterrorism

U.S. Army course in biologic warfare and terrorism

DEA Special Testing Lab Seminar June 2011

Sigma-Aldrich LC/MS – New Applications Fall 2011

Journal Publications

Screening, 1992, 1:34-37; Lawler,M., Frederick,S., Rodriguez-Anza, S., Wolf,B., Levy,H., *Newborn Screening for Biotinidase Deficiency, Pilot Study and Follow-up of Identified Cases*

Genetic Screening, 1990, 11-18, Mitchell,M., Lawler,M., Walraven,C., Hermos,R., *To Screen or Not to Screen for Congenital Hyperplasia: Is that the Question?*

The Journal of Pediatrics, 116: 78-83, Secor-McVoy,J., Lawler,M., Schmidt, M., Ebers,D., Hart,P., Pettit,D., Blitzer,M., Wolf,B., *Partial Biotinidase Deficiency: Clinical and Biochemical Features*

Professional Affiliations

Northeastern Association of Forensic Scientists (NEAFS) since 2005

Awards

Theobald Smith Education Grant for graduate studies

Curriculum Vitae

Kate A. Corbett

Education

Bachelor of Science Degree, CHEMISTRY May 2003

MERRIMACK COLLEGE

Coursework included: Organic Chemistry, Inorganic Chemistry, Quantitative Analysis, Instrumental Analysis, Physical Chemistry, Physics, Calculus

Employment

Chemist II State Laboratory Institute (March 2008-Present)

Massachusetts Department of Public Health

Drug Analysis Laboratory

- Responsible for the identification of substance and trafficking substances to determine violation of the Massachusetts drug laws
- Responsible for the identification of pharmaceuticals to determine violation of the Massachusetts drug laws
- Operate analytical instrumentation, microscopes and balances for forensic drug analysis

Chemist I State Laboratory Institute (2005-March 2008)

Massachusetts Department of Public Health

Drug Analysis Laboratory

- Responsible for the identification of substance to determine violation of the Massachusetts drug laws
- Operate analytical instrumentation for the purpose of performing forensic drug analysis
- Successfully completed an eight week training course in the analysis of drugs conducted by senior staff of the Department of Public Health, Drug Analysis Laboratory
- Appointed an assistant analyst for the Department of Public Health, Drug Analysis Laboratory in 2005

Research Associate (September 2003 – August 2005)

SENSOR TECHNOLOGIES, INC - Shrewsbury, MA

- Prepared chemistries used in making sensor beads
- Generated and examined sensors employing fluorescence spectroscopy
- Performed protein, dye and sugar assays using UV/VIS spectrophotometry
- Carried out titrations on ricin using fluorescence correlation spectroscopy
- Statistical analysis of experimental data

Intern (March 2003 – August 2003)

MASSACHUSETTS STATE POLICE CRIME LABORATORY - Sudbury, MA

- Assisted in the gathering of case files to fulfill the National Institute of Justice's No Suspect Backlog Reduction Grant
- Observed in the Evidence, Criminalistics, DNA, Drug, Trace, Toxicology, and Bomb/Arson Units

DRUG RECEIPTBOOK # 156PAGE # 181

DESTRUCTION # _____

District/Unit B101DName & Rank of Arresting Officer PO Brendan Lyons / Michael Condon ID# 82917 / 93431

DEFENDANT'S NAME

ADDRESS

CITY

STATE

Ma

DESCRIPTION OF ITEMS SUBMITTED

GROSS
QUANTITY

LAB USE ONLY

GROSS
WEIGHTANALYSIS
NUMBER1 pill bottle of clonazepam49 pills22.89g

To be completed by ECU personnel only

Name and Rank of Submitting Officer [Signature]ID# 9370Received by [Signature]Date 11-14-11

ECU Control # _____

[REDACTED]

Date Analyzed: 1/12/12

City: Boston D.C.U. Police Dept.
Officer: P.O. Diana Lopez

[REDACTED]

Amount: 49.0

Subst: TAB

No. Cont: 1 Cont: pc

Date Rec'd: 11/14/2011

No. Analyzed: 2

Gross Wt.: 22.89 ✓

Net Weight: 8.14g

Tests: 1/12/12

2 Inj tabs to test



Prelim: clonazepam

Findings:

Clonazepam

Pharmaceutical Analysis Sheet

12-17
11

Count 49 tablets Description: Rx bottle E.O. weight 22.89g
Ballistic I.D. clonazepam 1mg   net wt = 8.1422g
I.D. Source Micromedex green
Final I.D. clonazepam MS chemist KAC completed 1/12/12

Drug Information

DRUG NAME: CLONAZEPAM

INGREDIENTS: CLONAZEPAM -- 1 MG

Color: Green

Shape: Circle

Imprint: 833 This tablet is debossed with 833 above the scored line and TEVA on the unscored side , TEVA

Form: Oral Tablet

Available-Container-Size: Bottle of 100 , Bottle of 1000 , Bottle of 500

AAPCC Code: 007000 -
Benzodiazepines

NDC: 00093-0833-93

00093-0833-10

00093-0833-05

00093-0833-01

Excipients: Lactose
(Monohydrate) ; Magnesium
Stearate ; Cellulose,
Microcrystalline ; Povidone ; Water,
Purified ; Starch, Corn ; D&C Yellow No.
10 Aluminum Lake ; FD&C Blue No. 1
Aluminum Lake

Regulatory Status: Schedule IV

Availability: United States

Product ID 7150694

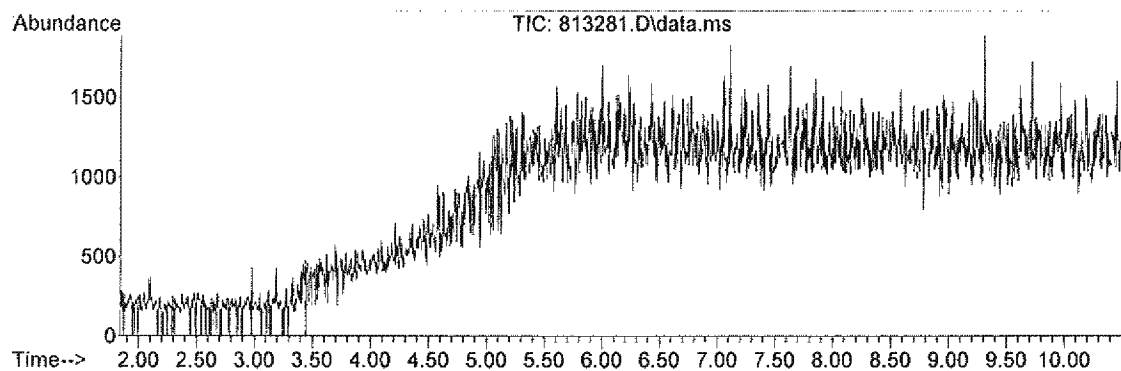
Contact: Teva Pharmaceuticals

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✓KAC
2/15/12

Information from Data File:

Operator : KAC
Date Acquired : 12 Jan 2012 6:53
Sample Name : BLANK
Submitted by :
Vial Number : 2
AcquisitionMeth: CLONAZ.M
Integrator : RTE

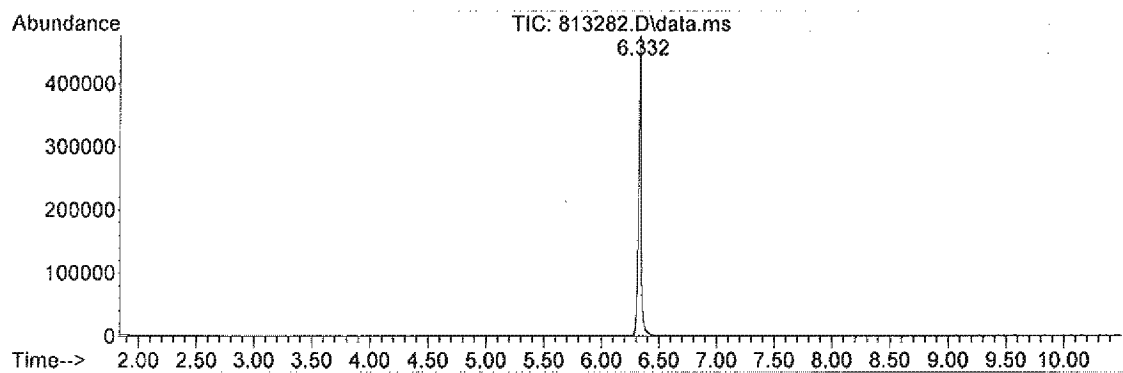


| Ret. Time | Area | Area % | Ratio % |
|-----------|------|--------|---------|
|-----------|------|--------|---------|

NO INTEGRATED PEAKS

Information from Data File:

Operator : KAC
Date Acquired : 12 Jan 2012 7:06
Sample Name : CLONAZEPAM STD
Submitted by :
Vial Number : 82
AcquisitionMeth: CLONAZ.M
Integrator : RTE



| Ret. Time | Area | Area % | Ratio % |
|-----------|------|--------|---------|
|-----------|------|--------|---------|

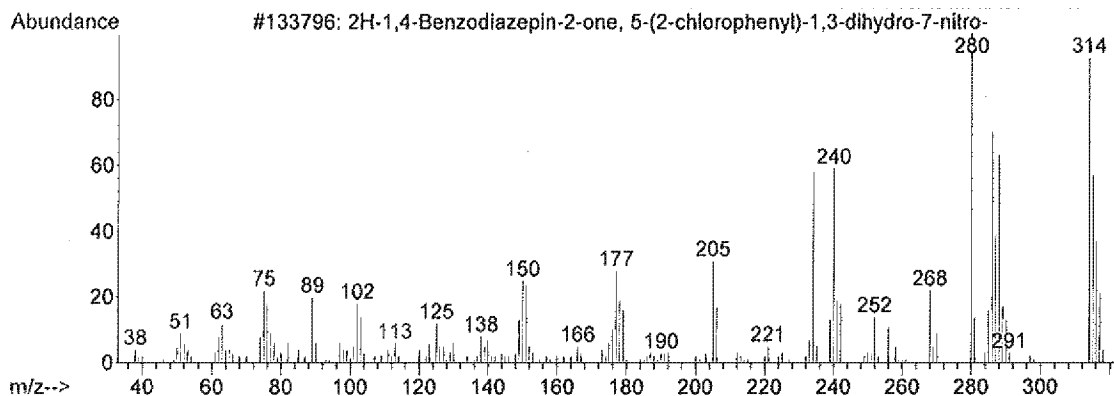
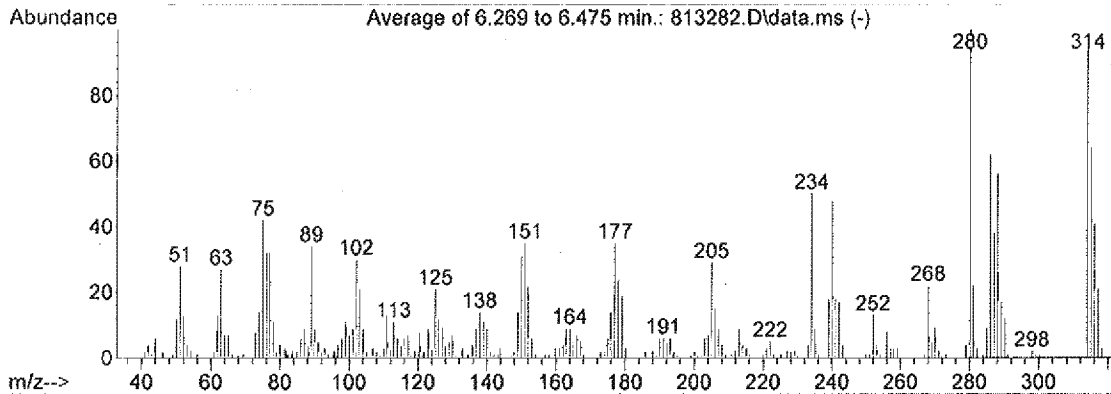
| | | | |
|-------|--------|--------|--------|
| 6.332 | 785213 | 100.00 | 100.00 |
|-------|--------|--------|--------|

Information from Data File:

Operator : KAC
Date Acquired : 12 Jan 2012 7:06
Sample Name : CLONAZEPAM STD
Submitted by :
Vial Number : 82
AcquisitionMeth: CLONAZ.M
Integrator : RTE

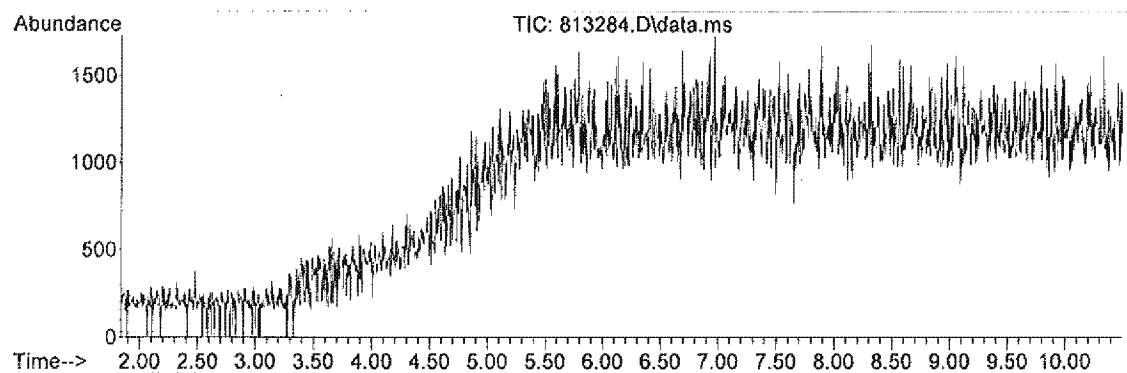
Search Libraries: C:\Database\SLI.L Minimum Quality: 80
C:\Database\NIST05a.L Minimum Quality: 80
C:\Database\PMW_TOX2.L

| PK# | RT | Library/ID | CAS# | Qual |
|-----|------|-------------------------------------|-------------|------|
| 1 | 6.33 | C:\Database\NIST05a.L | | |
| | | 2H-1,4-Benzodiazepin-2-one, 5-(2-ch | 001622-61-3 | 99 |
| | | 2H-1,4-Benzodiazepin-2-one, 5-(2-ch | 001622-61-3 | 99 |
| | | 2H-1,4-Benzodiazepin-2-one, 5-(2-ch | 001622-61-3 | 92 |



Information from Data File:

Operator : KAC
Date Acquired : 12 Jan 2012 7:32
Sample Name : BLANK
Submitted by : MGL
Vial Number : 2
AcquisitionMeth: CLONAZ.M
Integrator : RTE

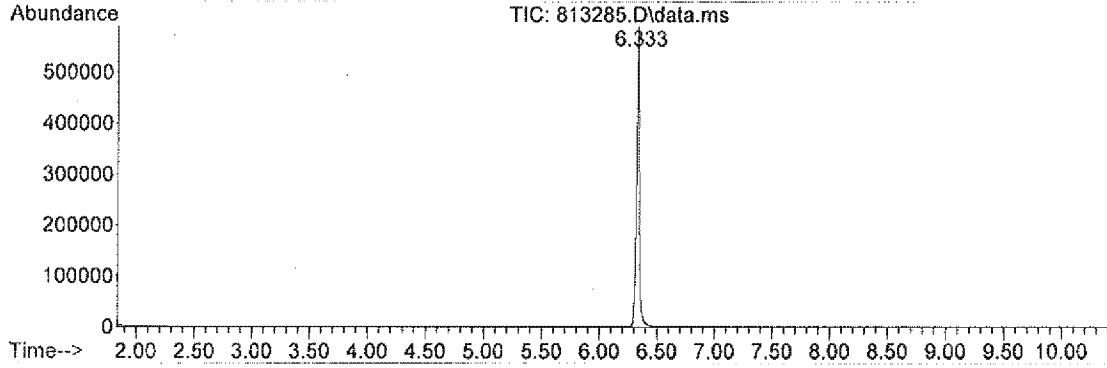


| Ret. Time | Area | Area % | Ratio % |
|-----------|------|--------|---------|
|-----------|------|--------|---------|

NO INTEGRATED PEAKS

Information from Data File:

Operator : KAC
 Date Acquired : 12 Jan 2012 7:45
 Submitted by : MGL
 Vial Number : 85
 AcquisitionMeth: CLONAZ.M
 Integrator : RTE



| Ret. Time | Area | Area % | Ratio % |
|-----------|---------|--------|---------|
| 6.333 | 1008612 | 100.00 | 100.00 |

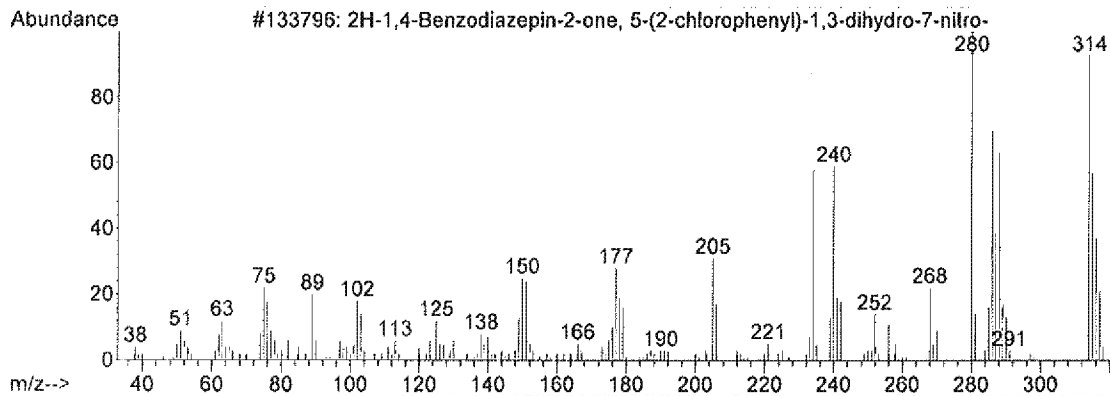
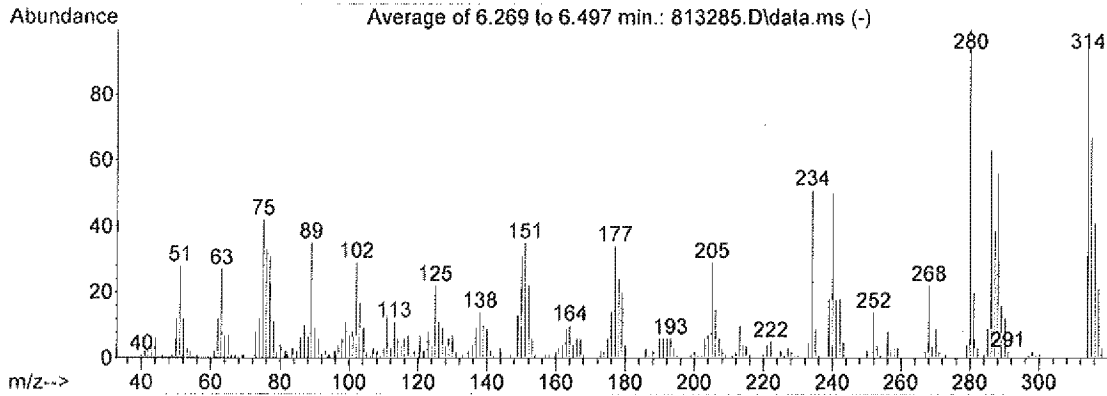
Information from Data File:

Operator : KAC
Date Acquired : 12 Jan 2012 7:45

Submitted by : MGL
Vial Number : 85
AcquisitionMeth: CLONAZ.M
Integrator : RTE

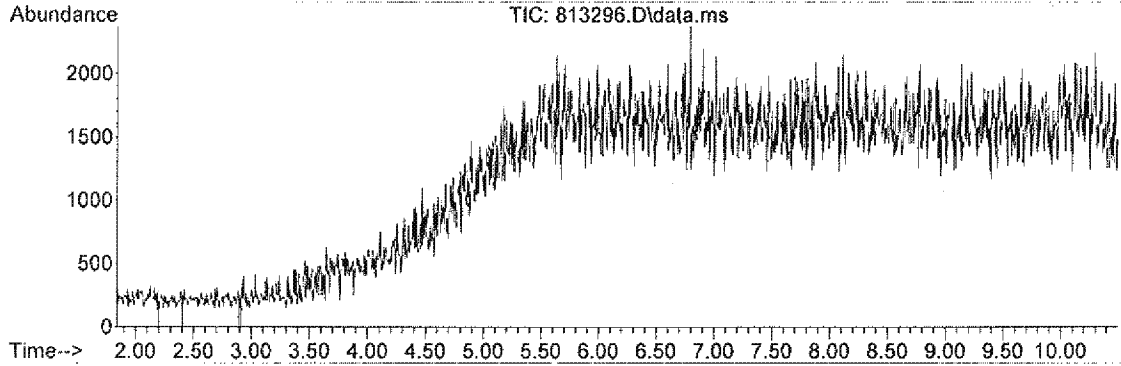
Search Libraries: C:\Database\SLI.L Minimum Quality: 80
C:\Database\NIST05a.L Minimum Quality: 80
C:\Database\PMW_TOX2.L

| PK# | RT | Library/ID | CAS# | Qual |
|-----|------|-------------------------------------|-------------|------|
| 1 | 6.33 | C:\Database\NIST05a.L | | |
| | | 2H-1,4-Benzodiazepin-2-one, 5-(2-ch | 001622-61-3 | 99 |
| | | 2H-1,4-Benzodiazepin-2-one, 5-(2-ch | 001622-61-3 | 99 |
| | | 2H-1,4-Benzodiazepin-2-one, 5-(2-ch | 001622-61-3 | 92 |



Information from Data File:

Operator : KAC
Date Acquired : 12 Jan 2012 10:09
Sample Name : BLANK
Submitted by :
Vial Number : 2
AcquisitionMeth: CLONAZ.M
Integrator : RTE

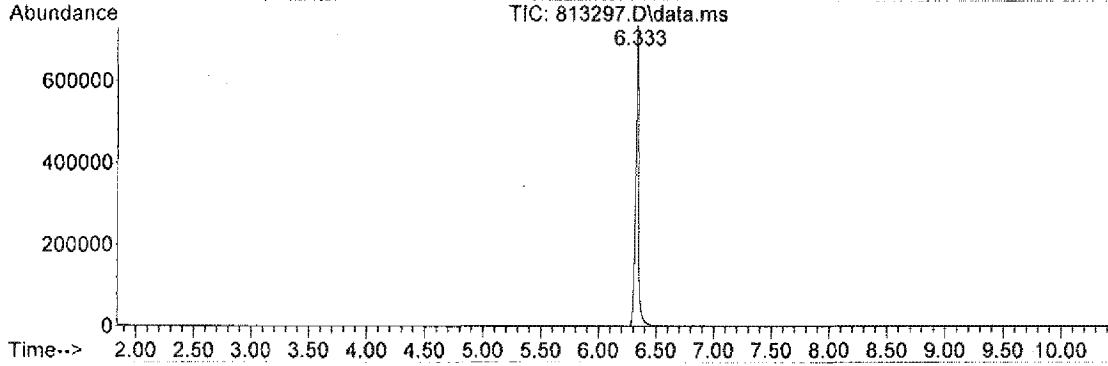


| Ret. Time | Area | Area % | Ratio % |
|-----------|------|--------|---------|
|-----------|------|--------|---------|

NO INTEGRATED PEAKS

Information from Data File:

Operator : KAC
 Date Acquired : 12 Jan 2012 10:22
 Sample Name : CLONAZEPAM STD
 Submitted by :
 Vial Number : 82
 AcquisitionMeth: CLONAZ.M
 Integrator : RTE



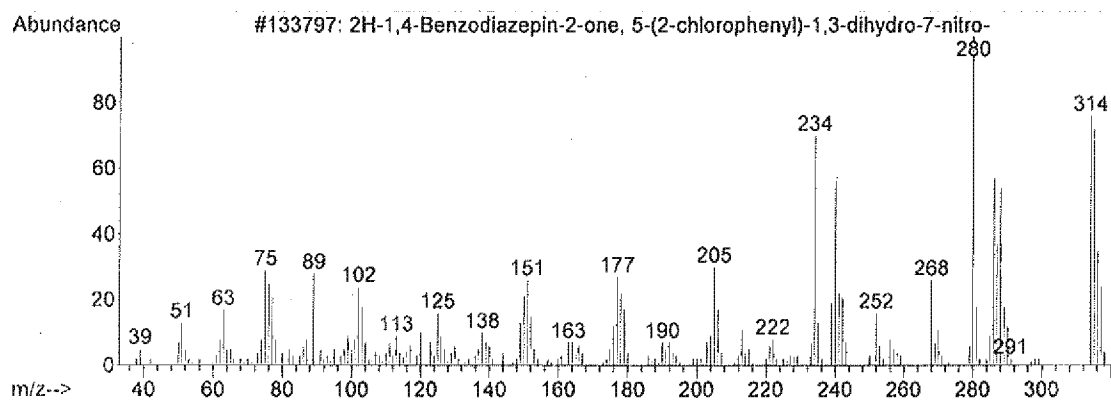
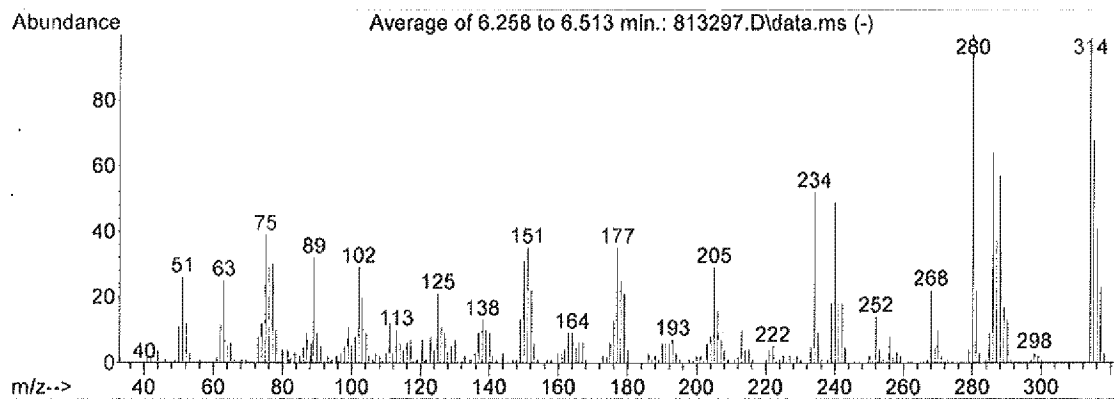
| Ret. Time | Area | Area % | Ratio % |
|-----------|---------|--------|---------|
| 6.333 | 1345961 | 100.00 | 100.00 |

Information from Data File:

Operator : KAC
Date Acquired : 12 Jan 2012 10:22
Sample Name : CLONAZEPAM STD
Submitted by :
Vial Number : 82
AcquisitionMeth: CLONAZ.M
Integrator : RTE

Search Libraries: C:\Database\SLI.L Minimum Quality: 80
C:\Database\NIST05a.L Minimum Quality: 80
C:\Database\PMW_TOX2.L

| PK# | RT | Library/ID | CAS# | Qual |
|-----|------|-------------------------------------|-------------|------|
| 1 | 6.33 | C:\Database\NIST05a.L | | |
| | | 2H-1,4-Benzodiazepin-2-one, 5-(2-ch | 001622-61-3 | 99 |
| | | 2H-1,4-Benzodiazepin-2-one, 5-(2-ch | 001622-61-3 | 99 |
| | | 2H-1,4-Benzodiazepin-2-one, 5-(2-ch | 001622-61-3 | 99 |



Last page.....no further data